

EXHIBIT D

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**ORDER AUTHORIZING THE PRIVATE INSURANCE CLASS CLAIMANTS
TO FILE CLASS PROOFS OF CLAIM**

Upon the motion dated July 2, 2020 (the “Motion”) of Eric Hestrup, *et al.* (collectively, “Private Insurance Plaintiffs”), in their individual and representative capacities (and with the class members, collectively, the “Private Insurance Class Claimants”) in their respective actions (the “Private Insurance Class Actions”), for an order, pursuant to Rule 23 of the Federal Rules of Civil Procedure, made applicable to this matter by Rules 7023 and 9014 of the Federal Rules of Bankruptcy Procedure, granting the Private Insurance Plaintiffs leave to file one or more class proofs of claim (the “Class Proofs of Claim”), as may be appropriate [Docket No. _____]; and upon the hearing held July 23, 2020 (the “Hearing”); and for cause shown, it is hereby

ORDERED that the Motion is granted in its entirety; and it is further

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrum Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

ORDERED that pursuant to Federal Rules of Bankruptcy Procedure 9014 and 7023,
Private Insurance Plaintiffs have satisfied the standards set forth in Federal Rule of Civil
Procedure 23, and are authorized to file the Class Proofs of Claim; and it is further

ORDERED that the Private Insurance Plaintiffs are authorized to file one or more Class
Proofs of Claim for all monetary components of the relief sought in the Private Insurance Class
Actions, including (but not limited to) money damages, restitution, statutory and civil penalties,
and any claim for counsel fees and expenses; and it is further

ORDERED that entry of this Order is not a determination of the validity or priority of the
Class Proofs of Claim in any amount. This Order shall not prejudice any defense of law or fact
by the Debtors.

Dated: White Plains, New York
July __, 2020

United States Bankruptcy Judge